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1 and we talked about the Web GUI interface, where we
2 had to summarize a history of changes that we had
3 made. Another case was we had a power outage in our
4 Blue Hill data center, which wiped out everyone. We
5 also put that out as a proactive notification
6 through the help desk.

7 Q. Mr. Miller, in your opening statement I
8 believe you indicated that during the month of July
9 48,000 LSRs were submitted by CLECs doing business
10 in Massachusetts; is that correct?

11 A. [MILLER] That's correct.

12 Q. Could you tell us how much of those were via
13 EDI versus via the GUI?

14 A. [MILLER] I don't have that information
15 immediately at hand.

16 Q. Does anybody else?

17 Let me ask the followup question before
18 I frame it as a proposed record request. I assume
19 the answer to the followup question is going to be
20 no: Can you tell us how many of those LSRs were
21 submitted via EDI using the LSOG 4 systems?

22 A. [MILLER] No, I'm not able to do that right
23 now.

24 MR. SALINGER: I'd propose, then, as a

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1 submitted on EDI LSOG 4 systems?

2 A. [MILLER] I'm sorry; you'll have to repeat
3 that. Is it the same question that you were asking
4 earlier about the July numbers for Massachusetts.
5 you're now applying the same breakdown for the
6 entire region for LSOG 4?

7 Q. Let me back up and ask a preliminary
8 question to make sure we're on the same page. LSOG
9 4 systems are available versus EDI now. CLECs who
10 use the GUI, can they also choose to use either LSOG
11 2 or LSOG 4 systems?

12 A. [MILLER] Yes, they can.

13 Q. So, yes, I'm asking, of those half-million
14 LSRs that you represent have been processed using
15 LSOG 4 interface, how many of those were submitted
16 via the GUI and how many of those were submitted
17 using LSOG 4 EDI systems?

18 MS. CARPINO: That's proposed Record
19 Request P.

20 A. [MILLER] I don't have that answer
21 immediately.

22 Q. I understand. I've proposed that it be
23 issued as a record request.

24 (RECORD REQUEST.)

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1 record request that Verizon explain, of the 48,000
2 LSRs submitted for Massachusetts in July, how many
3 were submitted versus the GUI, how many were
4 submitted versus EDI systems, and of that latter
5 category, how many were submitted versus LSOG 4 EDI
6 systems.

7 A. [McLEAN] I can answer to the EDI versus
8 Web: Of the 48,000 in July, 3,615 via EDI, 44,610
9 via Web. I do not know LSOG 4, LSOG 4.

10 MS. CARPINO: The latter part of Mr.
11 Salinger's question will be proposed Record Request
12 O.

13 (RECORD REQUEST.)

14 Q. A similar attempt at clarification:
15 Mr. Miller, you also indicated that to date -- and I
16 take it this is nationwide -- half a million LSRs
17 have been processed using LSOG 4 interfaces. Am I
18 remembering that correctly?

19 A. [MILLER] Yes, you are.

20 Q. First of all, am I right that that's
21 nationwide, not just Massachusetts?

22 A. [MILLER] That is nationwide.

23 Q. Of those half a million LSRs, how many of
24 those were submitted versus the GUI, versus

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1 Q. Let's switch to a statement you made,
2 Mr. Miller, about billing. I think in your opening
3 presentation you suggested that there was
4 essentially one billing problem that had been
5 identified by CLECs, and you gave some information
6 on the status of it. First of all, could you
7 explain what that billing problem is?

8 A. [MILLER] I can tell you the nature of the
9 billing problem generally. Perhaps Mr. Sampson
10 could clarify it.

11 The nature of the billing problem is
12 associated with the -- it was a WorldCom claim that
13 in fact there were some issues associated with
14 customers who were migrating from Verizon to
15 WorldCom who were in a nonpayment status with
16 Verizon at the time of their migration, and the
17 claims were being made that they were being
18 disconnected following the migration. Perhaps Mr.
19 Sampson can clarify that.

20 A. [SAMPSON] That is the MCI claim about SNPs.
21 Now, we instituted a manual process back in May, and
22 just last weekend we had a permanent fix put in,
23 which provided information to representatives which
24 we expect will prevent these SNPs from occurring.

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1 But I do believe the original response really
2 referred to one observation, 41.1, that was the only
3 observation where our fix is in and scheduled to be
4 in the October release, and that is the only
5 observation that was not, not only satisfied, but
6 implemented. That involved a nonrecurring charge on
7 one USOC, and that will be fixed in October.

8 Q. Again, Mr. Miller, toward the end of your
9 opening presentation, I believe you told the
10 Department that for the June release of new OSS's
11 that Verizon had 100 percent of the time provided
12 on-time notification of systems changes. Did I hear
13 that correctly?

14 A. [MILLER] Yes, you did.

15 Q. Is that the same statistic that's recited,
16 not just with respect to June, but with respect to
17 other months, in Paragraph 104 of the Verizon
18 supplemental OSS affidavit?

19 A. [MILLER] Yes, the statement in the
20 affidavit says this includes 100 percent performance
21 in January, March, May, and June.

22 Q. Mr. Miller, are you familiar with Mr.
23 Toothman's response to Discovery Question DTE-6-6 to
24 Verizon?

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1 particular change on June 18th but did not provide
2 any notice to the CLECs until after that, on June
3 19th. Is that a fair paraphrase?

4 A. [MILLER] Yes, that's a fair paraphrase.

5 Q. Given this response by Verizon, how could it
6 be that Verizon 100 percent of the time in June
7 provided timely change-management notices?

8 A. [MILLER] It would appear that this one
9 example missed a deadline by one day.

10 Q. So the 100 percent statistic is incorrect
11 for June.

12 A. [MILLER] Yes. Mr. Toothman, I think, can
13 add some information on that.

14 A. [TOOTHMAN] The 100 percent that we've been
15 talking about generally applied to Type 4 change
16 notification. This ATN situation described in this
17 response is really what we consider a Type 1. So
18 where we didn't follow for Type 1, the 100 percent,
19 we were applying the Type 4 notification.

20 Q. So everybody is on the same page, first of
21 all: A Type 4 notification is a Verizon-initiated
22 change?

23 A. [TOOTHMAN] Right.

24 Q. And a Type 1 notification is a so-called

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1 A. [MILLER] I would have to look at the
2 response to which you're referring.

3 MR. SALINGER: Mr. Rowe, could somebody
4 make that available for Mr. Miller? This is a
5 question from the Department to Verizon, No. 6-6.

6 A. [TOOTHMAN] Is this the question about ATN?

7 Q. Yes.

8 MR. SALINGER: Mr. Hazzard is indicating
9 that he has a copy that he can share with the
10 Verizon folks, if that would speed things up.

11 MR. ROWE: There's a shortage of space
12 at the table, and the witnesses don't have all the
13 documents on the table, nor could they.

14 MR. SALINGER: Understood.

15 MR. ROWE: It may be that Mr. Toothman
16 will have it in a moment.

17 (Pause.)

18 A. [MILLER] We have the response.

19 Q. Let me paraphrase the response, and tell me
20 if I misrepresent it. As I understand it, Mr.
21 Toothman acknowledges in the first sentence of the
22 reply that in connection with the June software
23 release Verizon failed to adhere to the change
24 management process because it implemented a

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1 emergency change?

2 A. [TOOTHMAN] Right, a defect change.

3 Q. And what was the nature of this particular
4 change?

5 A. [TOOTHMAN] There was some inconsistency in
6 the way the systems were applying an edit to a field
7 called ATN, account telephone number.

8 Q. When did Verizon first learn of this
9 problem?

10 A. [TOOTHMAN] I'm not sure.

11 Q. In June you made the change to the system on
12 the 18th. You told CLECs about it on the 19th.
13 This created some problems, and for the short term,
14 the way you fixed those problems was, you undid the
15 systems change. Is that correct?

16 A. [TOOTHMAN] Correct. We made a systems
17 change in the systems in the north, the New York/New
18 England area, and we backed that change out Monday
19 night, whatever that Monday was.

20 Q. Backing the change out means you undid the
21 change and went back to the systems the way they
22 were before with respect to that particular item?

23 A. [TOOTHMAN] True.

24 Q. And after that the systems continued to

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1 function?

2 A. [TOOTHMAN] Yes.

3 Q. How was it, then, that this change was a
4 Type 1 or emergency change?

5 A. [TOOTHMAN] Our systems in the south were
6 applying an edit to the field that basically --

7 Just to back up: That field is optional
8 in some circumstances. The systems in the south, if
9 you populated data in that field when it was
10 optional, we were rejecting the request, in essence
11 making the field prohibitive. You could not
12 populate it.

13 In the north the systems were following
14 the business rules that the field was optional, and
15 if you populate data in that field we would not
16 reject the request but ignore the data in the field.
17 So the systems were not operating in the same
18 manner.

19 So the decision was made to bring the
20 systems in uniformity, to change the business rule
21 to adhere to the way the south systems were
22 operating.

23 Q. My question, Mr. Toothman, is: Why would
24 this not be categorized as a Type 4 Verizon-

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1 we'd know that is to pull out the transcript and
2 look at it.

3 MR. SALINGER: Actually, that's not
4 true, Mr. Rowe. We have in the room all of the
5 folks we had yesterday from your witness panel; is
6 that correct? Can somebody answer that?

7 MR. ROWE: Yes, it's correct.

8 MR. SALINGER: So if there was somebody
9 who yesterday made a response to AT&T's Answer 1-4B,
10 1-4C, or 1-4D, I would ask them to speak up and tell
11 us that. If we get silence as the response --

12 MR. BEAUSEJOUR: We'll pull out the
13 request, because it could very well have been
14 encompassed in some of the other sections. It would
15 refresh the witnesses' recollection of what the
16 request said, and we'll go from there.

17 MR. SALINGER: Mr. Beausejour, if you
18 want to do something different on your redirect,
19 that's fine.

20 MR. BEAUSEJOUR: You've asked the
21 witnesses a question.

22 MR. SALINGER: Mr. Beausejour, if I
23 could finish, please.

24 MR. BEAUSEJOUR: Go ahead.

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1 initiated change, rather than a Type 1 emergency
2 change?

3 A. [TOOTHMAN] Well, Type 1 applies to when
4 systems are not operating per the documentation or
5 the documentation doesn't reflect what the systems
6 are doing. So this was a case where the
7 documentation and the systems were not in sync, and
8 we categorize those as Type 1's.

9 Q. I had asked a few moments ago just to
10 confirm that during the opening presentation there
11 had been no response to AT&T's response to discovery
12 request DTE-AT&T-1-5. Just so I'm on the same page
13 as you folks, I want to briefly do the same exercise
14 with respect to some of the other AT&T OSS-related
15 discovery responses and just confirm that Verizon
16 did not in its opening statement make a response.

17 MR. ROWE: I think that's going to be a
18 matter of record.

19 MS. CARPINO: I don't think it will be
20 time-consuming, so why doesn't Mr. Salinger just
21 proceed.

22 Q. I don't believe there was a response stated
23 for 1-4B, C, or D. Am I correct or incorrect?

24 MR. ROWE: Ms. Carpino, the only way

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1 MR. SALINGER: Your witnesses identified
2 specific answers to which they were responding. All
3 I'm trying to confirm is that I got it right and
4 that nobody was responding to certain ones of them.
5 We've gotten silence to that question. Let me ask
6 the same question with respect to Questions 1-6,
7 1-7, 1-8, or 1-9.

8 Q. Did anyone voice a response to any of those
9 in discovery answer yesterday?

10 MR. BEAUSEJOUR: I'm going to ask that
11 we be permitted to review 1-4, and then we can go
12 from there. We'll pull out the information
13 responses and have the witnesses review them.

14 MR. SALINGER: Ms. Carpino, the
15 witnesses know what they said yesterday. They spoke
16 to these particular items. It's a very simple
17 question.

18 MS. CARPINO: I think Mr. Salinger has a
19 point. If the witnesses addressed those questions,
20 please indicate affirmatively. Otherwise we'll move
21 along. And if Mr. Beausejour would like to have his
22 witnesses review the other -- those questions
23 mentioned by Mr. Salinger, you can do that during
24 redirect.

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1 MR. BEAUSEJOUR: Fine. Thank you.
2 MR. SALINGER: Let the record reflect
3 that the response to my last question is also
4 silence, so apparently there was no --
5 MR. BEAUSEJOUR: There was no response.
6 WITNESS McLEAN: I would like to
7 clarify?
8 MS. CARPINO: Ms. McLean?
9 WITNESS McLEAN: I spoke to 1-4A. I did
10 not speak to 1-4C because AT&T in their data request
11 withdrew the comment that they had made. So I did
12 not feel it required additional clarification.
13 Q. Just to pause on 1-4C, and then I'll let you
14 finish the answer with respect to the others, but so
15 the record is clear: You do understand that in 1-4C
16 AT&T clarified its prior statement and made a
17 further statement. Yes?
18 A. [McLEAN] AT&T had asserted that their
19 acknowledgments were missing. AT&T refined their
20 comment and said acknowledgments weren't missing but
21 were not timely.
22 Q. Yes; thank you. Go ahead.
23 A. [McLEAN] I did not respond to B because I
24 believe the evidence that we recounted with respect

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1 to the other items demonstrated that B was not
2 factually correct.
3 Q. Any further clarification, Ms. McLean?
4 A. [McLEAN] No.
5 Q. Thank you. (Pause.)
6 A. [McLEAN] We did respond to D. Julie Canny
7 responded to D, I believe, which was a question
8 about timeliness of confirmations.
9 Q. Ms. Canny, is that right? Was your response
10 to 1-4D?
11 A. [CANNY] I wrote down A, but my notes from
12 yesterday -- I did respond to the comment on late
13 confirmations and late completion notices. The note
14 I have was for A, but that may have been the wrong
15 note. This is my hand-scratching.
16 Q. And which among you was addressing 1-4F?
17 A. [BARRY] I was.
18 Q. Mr. Barry, you described two main categories
19 of incorrectly rejected orders. One were supps.
20 made within 24 hours of the due date; is that right?
21 A. [BARRY] Supps. dated within 24 hours?
22 Q. Yes.
23 A. [BARRY] No, it was beyond 24. They were
24 not accepting supps. within 24 hours. They were

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1 being queried back before the 24 hours of the due
2 date.
3 Q. And I think you explained that those query
4 backs were in error, and you gave an explanation of
5 what's been done to work with reps to train them to
6 do it correctly in the future?
7 A. [BARRY] Correct.
8 Q. Do you, or does anybody else on the panel,
9 know whether this is something that was discovered
10 by KPMG in its review?
11 A. [BARRY] I don't know.
12 Q. And Mr. Barry, I think the other category
13 you identified had to do with some confusion between
14 LSOG 2 and LSOG 4 requirements. I think you said
15 nine LSRs were improperly queried back for that
16 reason?
17 A. [BARRY] That's true.
18 Q. And again, do you or does any other member
19 of the panel know whether this is an error that KPMG
20 was able to discern in its investigation?
21 A. [BARRY] What we did find is that one rep
22 issue that -- that created those nine errors within
23 the center. What the issue was is that in LSOG 2,
24 when you do a PIC and LPIC change, it is an alpha

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1 value that's carried. In LSOG 4 it's numeric. So
2 the one rep got confused with the process. The
3 manager did sit down with the individual to
4 reeducate that person.
5 Q. And with that clarification, Mr. Barry, my
6 question is: Do you or does any other member of the
7 panel know whether that's an error or problem that
8 had been discovered by KPMG during its
9 investigation?
10 A. [BARRY] I don't know.
11 Q. Mr. Barry, I think you indicated that of the
12 1389 LSRs that were identified in AT&T's response to
13 Question DTE-AT&T-1-4F, that based on the review by
14 you or your staff you had concluded that 81 of those
15 queries back were valid?
16 A. [BARRY] That's correct. 81 were valid.
17 AT&T sent approximately 2,000 platform requests with
18 their LSOG test. The 138 that were claimed to be
19 rejected equal the 6.91 percent of the orders that
20 were being processed. The investigators showed that
21 81 out of the 138 were in fact valid queries. What
22 we found is, 41 of those queries AT&T asked for a
23 feature that was not available in Massachusetts. 39
24 of those they requested expedites but requested a

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1 due date longer than the standard due-date interval.
2 And the last was actually an invalid due-date
3 interval. So that left 57 orders that we showed
4 were queried incorrectly, which equaled about 2.85
5 percent of the orders in the test.

6 Q. Do you have or do you regularly prepare a
7 listing by PON showing the explanation you just
8 provided in summary form of the reasons why Verizon
9 believes that those 81 orders were properly queried
10 back? In other words, a listing that can be matched
11 up against the information that AT&T provided in its
12 discovery response?

13 A. [BARRY] Yes, I did.

14 Q. I'd just ask that it be provided to us. If
15 Verizon is happy to do that, we don't even need to
16 make it a formal record request. We'd just like to
17 get that.

18 MS. CARPINO: We would also ask that
19 Verizon provide that to the Department as well.

20 MR. SALINGER: Perhaps, then, we should
21 make it as a proposed record request, so you can
22 keep track of it.

23 A. [BARRY] Could I ask for clarification? Do
24 you want a list by PON, each individual PON, or a

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1 address that we shipped them to and the date we
2 shipped them on. It tells you the end destination
3 of where we deposited the electronic notifiers at
4 AT&T.

5 Q. Well, can you -- not sitting here today, but
6 can you gather up the FTP file logs that would
7 support that conclusion?

8 A. [McLEAN] I don't know.

9 MR. SALINGER: Can we make another
10 proposed record request, for the FTP file logs that
11 support Verizon's contention that all 213 of those
12 LSRCs were returned to AT&T?

13 MS. CARPINO: Proposed Record Request R.
14 (RECORD REQUEST.)

15 Q. Ms. McLean, I think you were also the one
16 who spoke to AT&T's response to 1-4E, as in Edward,
17 having to do with the missing PCNs and BCNs.

18 A. [McLEAN] Yes, I spoke to the issue of
19 completeness of returning the notifiers. Again, Ms.
20 Canny spoke to issues of timeliness.

21 Q. With respect to the issue of completeness,
22 you agreed that, for example, 5.3 percent of the
23 PONs received no BCN, which is a smaller number than
24 AT&T had identified. You presented similar

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1 summary of what PONs? Just so I know.

2 Q. Maybe the easiest way to do it is to use the
3 list that we provided, which is in electronic form.

4 A. [BARRY] Which I have.

5 Q. And then do it by PON, expanding the same
6 spreadsheet.

7 MR. ROWE: Go ahead, Mr. Salinger.

8 MR. SALINGER: It might be easiest if I
9 can impose on you, Alan.

10 (Record request read from Page 2911,
11 Line 23 to Page 2912, Line 3.)

12 A. [BARRY] Yes, we can do that.

13 MS. CARPINO: We'll propose that as
14 Record Request Q.

15 (RECORD REQUEST.)

16 Q. Ms. McLean, I think you were the one
17 yesterday who spoke to the discovery request by
18 AT&T, 1-4A, regarding the 213 LSRCs, and you
19 indicated that Verizon's investigated and determined
20 that all 213 were indeed sent to AT&T?

21 A. [McLEAN] Yes.

22 Q. Do you have available or can you get the FTP
23 file logs that demonstrate that conclusion?

24 A. [McLEAN] I can give you the FTP server

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1 information about the provisioning completion
2 notices. I'd like to propose as a record request
3 that Verizon again provide us with the FTP file logs
4 that support and explain the difference between
5 Verizon's conclusion on these numbers and what AT&T
6 had presented.

7 A. [McLEAN] The evidence there will not be in
8 the FTP file log. The evidence there is actually
9 the denominator of the orders available to be
10 provisioned or to be billing completed. The number
11 AT&T used included 41 orders that had been rejected,
12 therefore were not eligible to be completed for
13 provisioning complete or billing complete.

14 Q. Then, Ms. McLean, let me propose an
15 alternate record request, unless you can answer this
16 sitting here, which is to provide us with a listing
17 of those 41 PONs and the reason why you believe that
18 they were improperly included in the denominator,
19 for each of them.

20 A. [McLEAN] Yes, we can do that.

21 MS. CARPINO: Proposed Record Request S.
22 (RECORD REQUEST.)

23 A. [McLEAN] I'd also like to point out that
24 this process that we have, a well-established

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1 process since March, of inquiring about missing
2 notifiers, whereby the CLEC provides Bell Atlantic
3 with a list, an electronic list, of the PONs. We
4 search the PONs, and we provide that information
5 back to the CLEC in electronic file as well as
6 reflowing the notifiers that they felt were missing.
7 So this is a well-established process. We will on
8 behalf of AT&T open a trouble ticket on these PONs.
9 follow that process, and provide them that same
10 information.

11 Q. Mr. Sampson, I think you were the person who
12 spoke about AT&T's response to 1-11.

13 A. [SAMPSON] That is correct.

14 Q. With respect to 1-11A, you described a
15 random sample of 100 calls where you checked and
16 Verizon believes confirmed that those calls were
17 recorded on the DUF. Is that right?

18 A. [SAMPSON] That is correct, but I made an
19 error yesterday that I discovered last night. It
20 wasn't 100 random; it was 55 random, and 45 of one
21 entire call set, the 900 calls. Additional calls
22 were made this morning, or additional numbers were
23 verified, and they were also found.

24 Q. For those 100 calls, the 55 random and the

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1 Q. Why don't you state in your own words what
2 you think the issue is that relates to AT&T's
3 response to Discovery Request DTE-A -- 11B.

4 A. [SAMPSON] On March the 9th we had a
5 business meeting with AT&T to discuss the issue of
6 removing the billing account numbers for resale.
7 AT&T stated that they were not in the resale
8 business and did not want -- they are receiving
9 bills that they did not believe were theirs and they
10 wanted these billing account numbers disconnected.

11 Q. Did you say March or May?

12 A. [SAMPSON] May; May the 9th, I believe it
13 was. In my opening statement I had the correct
14 date.

15 At that meeting we agreed that Verizon
16 would research each of the BANs and provide any end
17 users that were still attached to those BANs. AT&T
18 would then issue a disconnect order to remove those
19 TN's from the billing account number, so that there
20 were no end users now associated with the BAN. At
21 that point AT&T would formally request in writing
22 that Verizon disconnect the billing account number.
23 No disconnect orders were issued. There were only
24 six TN's, but no disconnect orders were issued, and

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1 44 from the 900 call set, could you provide a
2 listing for each of them of the DUF on which the
3 call was recorded and show where indeed that's
4 found? In other words, provide the documentation
5 supporting --

6 A. [SAMPSON] Yes, we can.

7 MR. SALINGER: I'd like to make that as
8 a proposed record request.

9 MS. CARPINO: Proposed Record Request T.
10 (RECORD REQUEST.)

11 Q. Mr. Sampson, let's turn to the issue raised
12 in Discovery Request 11B to AT&T. This has to do
13 with Verizon billing AT&T for resale customers even
14 though AT&T does not have any resale customers.
15 You're familiar with the issue; correct?

16 A. [SAMPSON] Your statement is not correct.
17 AT&T does have six resale customers, and we provided
18 the PONs where they ordered that service.

19 Q. Let's restate it, because I think we're in
20 sync; I just misstated the question. You're
21 familiar with the issue of Verizon billing AT&T for
22 resale customers who in fact are not AT&T resale
23 customers; correct?

24 A. [SAMPSON] No, I'm not.

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1 no written requests were provided to disconnect the
2 BAN, billing account number.

3 Q. And do you have documentation that confirms
4 these communications and the substance, including
5 identification on --

6 A. [SAMPSON] On May the 26th an e-mail was
7 sent to AT&T which included the six associated TN's
8 that needed disconnection.

9 MR. SALINGER: I'd like to propose a
10 record request, that that communication be provided.

11 MS. CARPINO: Proposed Record Request U.
12 (RECORD REQUEST.)

13 Q. Let's turn back to the supplemental OSS
14 affidavit filed by Verizon on August 4. In
15 particular, let's turn to Paragraph 30. Mr. Miller,
16 do you have Paragraph 30 in mind?

17 A. [MILLER] Yes, I do.

18 Q. Were you intending to suggest in Paragraph
19 30 that the ordering systems used in Massachusetts
20 today and available in Massachusetts today are the
21 same as those that were used in and available in New
22 York during the fall of 1999, at the time that the
23 FCC was considering Bell Atlantic - New York's
24 Section 271 application?

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1 A. [MILLER] I think this is referring to the
2 transcript of the hearings that were held in
3 November last year, when at that time that was
4 correct.
5 Q. Let me reask my question, because I don't
6 think you answered what I was trying to learn. Were
7 you trying to suggest in Paragraph 30 that the
8 systems today in Massachusetts are the same as the
9 systems from last fall in New York?
10 A. [MILLER] I'm not trying to suggest that in
11 this paragraph, no.
12 Q. In fact, the systems that Verizon uses and
13 makes available today in Massachusetts are not the
14 same as the systems used and made available in New
15 York last fall, at least not in their totality; is
16 that correct?
17 A. [MILLER] I believe the one significant
18 difference change is that the introduction of the
19 Livewire system was made in both areas since that
20 time. So it would be then correct to say, as you
21 stated, that the systems used today in Massachusetts
22 are not identical to the systems that were used in
23 New York at that time.
24 Q. Is the Livewire system the same thing as the

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1 Netlink system, or are you talking about something
2 else?
3 A. [MILLER] No, there's no connection with the
4 Netlink system.
5 Q. What is the Livewire system?
6 A. [MILLER] The Livewire system is a system
7 that maintains the databases of the addresses and
8 locations and services within the serving offices.
9 Q. And could you provide a very small,
10 thumbnail sketch of how that differs today from what
11 was in place last fall?
12 A. [MILLER] The system that maintained similar
13 information last fall was a system known as PREMIS;
14 and that was, as I said, replaced in both
15 jurisdictions since that time.
16 Q. Is it fair to say that last fall during the
17 FCC's New York review your systems were making use
18 of something called ECXpert?
19 A. [MILLER] That was a system that was used to
20 capture the EDI transmissions of incoming tasks into
21 the back-end systems, into the ordering systems.
22 It's not an ordering system itself.
23 Q. Since that time ECXpert has been replaced?
24 A. [MILLER] That's correct.

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1 Q. By Netlink?
2 A. [MILLER] Yes.
3 Q. EDI systems based on the LSOG 4 standards
4 are now available for use in Massachusetts and New
5 York; is that right?
6 A. [MILLER] Yes, they are.
7 Q. They were not available during last fall's
8 review by the FCC of the New York petition, were
9 they?
10 A. [MILLER] No, they were not.
11 A. [McLEAN] If I could just clarify on that
12 question about the EDI systems: The EDI systems
13 were in place. The map set that was supported was
14 LSOG 2, last fall. The map set supported today is
15 LSOG 2 and LSOG 4. So the fundamental systems that
16 receive the EDI transmissions that translate them
17 are the same. We've just expanded the transaction
18 set they support.
19 Q. What is the system known as Request Manager?
20 A. [McLEAN] Request Manager is a gateway
21 system behind the EDI system and Web GUI system.
22 Q. Today in Massachusetts or New York, if a
23 CLEC is using LSOG 4 EDI interfaces, are their
24 orders being submitted through Request Manager?

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1 A. [McLEAN] Yes. They are being routed --
2 again, it is a gateway system that sits between the
3 transmissions we receive from the CLEC and the
4 shared OSS's.
5 Q. Request Manager was not in place in Bell
6 Atlantic North's systems last fall, was it?
7 A. [McLEAN] No, it was not. The system that
8 was in place is called DCAS and is actually built on
9 the same code base. We purchased the code base from
10 the same vendor. We had two parallel projects going
11 before NYNEX and Bell Atlantic merged, and we
12 completed the reintegration of that code base with
13 LSOG 4. So we now have a regionwide system, which
14 is the Request Manager system.
15 Q. Another way of stating that is that last
16 fall your systems used DCAS but now the LSOG 4 EDI
17 systems for Massachusetts and New York instead use
18 Request Manager. Is that correct?
19 A. [McLEAN] That's correct. And we continue
20 to support LSOG 2 in the north using DCAS, as we did
21 last fall. So now both are supported.
22 Q. Let's turn to the topic raised in Paragraph
23 60 to the supplemental OSS affidavit. Is Verizon
24 representing here to the Department that as of June

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1 or early July it had solved the prior problems that
2 were being experienced with late or missing LSRCs
3 and other notifiers?

4 A. [McLEAN] Yes.

5 Q. Are you aware of significant problems with
6 delayed LSRCs that occurred between July 19th and
7 July 27th of this year?

8 A. [McLEAN] I am not familiar with a specific
9 case. I am familiar with the fact that we have a
10 trouble-ticket process through which CLECs can
11 report delayed or missing notifiers, and we continue
12 to get trouble tickets with CLECs reporting delayed
13 or missing notifiers. I expect that will be a
14 normal course of business going forward.

15 Q. But you're not aware of a particularly
16 serious problem with late or missing notifiers
17 during the July 19th to July 27th time period?

18 A. [McLEAN] How would you characterize "a
19 particularly serious problem"?

20 Q. I wouldn't. Nothing that you're aware of in
21 your mind rises to the level of particularly serious
22 with respect to late LSRCs during that time period?

23 A. [McLEAN] No.

24 Q. Let's turn to Paragraph 77 of the

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1 CLECs that until AT&T began following this protocol
2 in mid-August also do not or did not follow this
3 protocol?

4 WITNESS McLEAN: I don't know. I'd have
5 to confirm that. Having the CLEC acknowledge to us,
6 return that acknowledgement to us, just gives us
7 another piece of information that, not only has the
8 notifier been deposited at their location, but that
9 it has been translated by their EDI translator.

10 Q. Let's turn to Paragraph 99 of the
11 supplemental OSS affidavit. In this paragraph
12 Verizon indicates that it is actively addressing
13 issues associated with line-loss reports. Could you
14 give us some more detail, an explanation, of what is
15 meant by that statement?

16 A. [SAMPSON] Richard Sampson. Bell Atlantic
17 continues to strive to meet CLEC expectations
18 regarding accuracy of the line-loss report. Because
19 of the dynamic nature and the number of customer
20 migrations between CLECs, the ability of the
21 industry to keep pace with these changes has been a
22 challenge. Over the past six months Bell Atlantic
23 has made at least 14 enhancements to this report in
24 response to CLEC input. The last of these major

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1 supplemental OSS affidavit; specifically, the last
2 two sentences, which comprise the last four lines of
3 that paragraph. If you have that in mind. My
4 question is: What is the basis for Verizon's
5 assertion that AT&T does not acknowledge receipt of
6 confirmation notices supplied by Verizon?

7 A. [McLEAN] The basis for that remark is that
8 as part of the EDI protocol, that when the
9 transmitter sends a transmission, the receiver
10 acknowledges that transmission. We call it acking,
11 a-c-k, an acknowledgement. When a CLEC sends a
12 transmission to Bell Atlantic, we return that
13 acknowledgement. It's also called a functional
14 acknowledgement or a Record Type 997.

15 When we return notifiers to the CLECs,
16 we initiate that transmission, and the CLEC should
17 return to us an acknowledgement of having received
18 that transmission, as part of the protocol. AT&T
19 did not follow that convention at the time this
20 statement was made. It's my understanding from our
21 technical-support people that AT&T has started to do
22 that approximately August 15th, and we can verify
23 that date.

24 MS. CARPINO: Are you aware of other

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1 changes were inputted in February and June of this
2 year.

3 We have a process in place where
4 whenever a CLEC finds an issue with the line-loss
5 report they call the technical help desk, a ticket
6 is opened up, and a fix -- we investigate the nature
7 of the problem, and a fix has been initiated in
8 every case that we've gotten a trouble ticket.

9 Over time we are finding that, although
10 issues are still reported, the number of TN's that
11 are affected are getting smaller and smaller. So we
12 do have confidence that the line-loss report does
13 provide accurate information to the CLEC community.
14 In addition to the OBF standards --

15 Q. Mr. Sampson, OBF stands for?

16 A. [SAMPSON] Ordering and billing form.

17 The ordering and billing form standards
18 only require that Verizon provide two pieces of
19 information, the conversion date and the working
20 telephone number. Verizon provides more information
21 than that. We provide the customer-type indicator;
22 we provide the billing telephone number; the working
23 telephone number, which is required; the effective
24 date of the conversion, which is required. We also

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1 provide an indicator of the old local service
2 provider and an indicator of what the new local
3 service provider is, which is additional marketing
4 information, for the CLECs and resellers.

5 Q. Does that complete that answer?

6 A. [SAMPSON] I think I acknowledged your
7 question. I hope I did.

8 Q. Is it fair to say, Mr. Sampson, that Verizon
9 has received complaints and trouble tickets from
10 CLECs about inaccuracies in line-loss reports?

11 A. [SAMPSON] Yes, that is correct.

12 Q. Including complaints that Verizon on its
13 line-loss report will list a customer as having left
14 a CLEC when in fact the customer has not left the
15 CLEC?

16 A. [SAMPSON] That is correct. The nature of
17 the process, inaccuracies occur -- inaccuracies can
18 occur on both conditions. And we've investigated
19 reports of both situations occurring.

20 Q. Has Verizon continued to receive trouble
21 tickets or complaints about line-loss report issues
22 after the June software release?

23 A. [SAMPSON] Yes, we continue to receive
24 issues that are investigated, and initiatives put in

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1 was sent to the commission?

2 A. [SAMPSON] I believe it was true. There
3 were issues on the table. The definition of
4 "significant" is a very subjective one. We had
5 issues that did affect certain sets of orders. They
6 were being addressed, and I believe the statement
7 was in its essence true.

8 Q. Do you happen to be aware, Mr. Sampson, of
9 the e-mail sent by AT&T in response to this May 26
10 Verizon e-mail, indicating that there in fact
11 remained at that time significant current problems
12 with Verizon's line-loss reports?

13 A. [SAMPSON] I have not seen that e-mail.

14 Q. You were aware then, as you are now, that
15 from the CLECs' perspective there remained and there
16 remain today significant current problems with the
17 line-loss report?

18 MR. ROWE: Are you speaking as to AT&T
19 or CLECs generally?

20 MR. SALINGER: I thought my question was
21 clear.

22 Q. Are you aware, Mr. Sampson, that from the
23 CLECs', plural, perspective there remain significant
24 problems with Verizon's line-loss report and that

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1 to correct them.

2 Q. As of late May of this year, was it true
3 that Verizon had been receiving trouble tickets and
4 complaints of this nature from CLECs?

5 A. [SAMPSON] That is correct.

6 Q. Could you turn, Mr. Sampson, to your answer
7 to discovery request from the Department DTE-6-4?

8 A. [SAMPSON] Yes.

9 Q. Do you have that in front of you?

10 A. [SAMPSON] Yes, I do.

11 Q. In that reply you quote from an e-mail that
12 was sent to the New York commission.

13 A. [SAMPSON] That is correct.

14 Q. Was that e-mail from you or from someone
15 else?

16 A. [SAMPSON] That e-mail was from someone
17 else.

18 Q. At the bottom of the first page there's a
19 sentence of the e-mail suggesting that CLEC feedback
20 indicates that there are no significant current
21 problems with the loss-of-line report. Do you see
22 that?

23 A. [SAMPSON] Yes, I do.

24 Q. Was that true at the time that this e-mail

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1 that was true also as of the end of May?

2 A. [SAMPSON] As I stated earlier, I don't
3 believe -- I can't characterize what they describe
4 them as. I do know that we do have some open issues
5 that we have received since May that are being
6 investigated. Some of them have been given an
7 initiative base to fix. I also know that the number
8 of TN's involved in the recent issues are
9 becoming -- the number of TN's involved involve
10 smaller and smaller numbers. So from that point of
11 view I'm beginning to get confidence that we're
12 beginning to get our arms around the total universe
13 of TN's that are required to be put on the line-loss
14 report.

15 So having said that, I don't believe the
16 issues are significant. They are serious, but not
17 significant.

18 Q. Mr. Sampson, as of the end-of-May time
19 frame -- well, for May, 2000, how many trouble
20 tickets did Verizon receive regarding line-loss
21 report problems and how many telephone numbers were
22 involved?

23 A. [SAMPSON] I don't know the answer to that
24 offhand.

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1 MR. SALINGER: I'd like to make that as
2 a proposed record request.
3 MS. CARPINO: Proposed Record Request V.
4 (RECORD REQUEST.)
5 Q. And Mr. Sampson, the same question with
6 respect to July of 2000: How many trouble tickets
7 did Verizon receive for line-loss report problems
8 and how many telephone numbers were involved?
9 A. [SAMPSON] I don't know the answer to that.
10 MR. SALINGER: I'd like to amend the
11 prior proposed record request, V. to include the
12 July time frame.
13 MS. CARPINO: All right.
14 (RECORD REQUEST AMENDMENT.)
15 MR. SALINGER: Thank you. I have no
16 further cross-examination of the panel.
17 MS. CARPINO: I think it's a good time
18 to break for lunch. Actually, we have a followup on
19 loss of line by Mr. Simon. Then we'll break for
20 lunch.
21 EXAMINATION
22 BY MR. SIMON:
23 Q. Mr. Sampson, just a couple of quick
24 questions regarding the line-loss reports. In

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1 report over NDM today, and there are a number of
2 others who we're working with to provide it over NDM
3 today.
4 MR. SALINGER: Ms. Carpino, could I ask
5 one followup clarification question?
6 MS. CARPINO: Yes, Mr. Salinger.
7 FURTHER CROSS-EXAMINATION
8 BY MR. SALINGER:
9 Q. Mr. Sampson, if Verizon does begin in
10 October to transmit line-loss reports over EDI, how
11 will that change of transmission media improve the
12 accuracy of the line-loss report?
13 A. [SAMPSON] I think it would be fair to say
14 that the transmission vehicle that one uses has
15 nothing to do with the quality of any system. It's
16 just a transmission medium.
17 MR. SALINGER: Thank you.
18 MS. CARPINO: With that, we will break
19 for one hour and 15 minutes.
20 (Recess taken.)
21 MS. CARPINO: Let's go back on the
22 record. We're going to begin this afternoon's
23 session with questions from WorldCom. Mr. Goldman?
24 CROSS-EXAMINATION

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1 Paragraph 99 of the order, August 4th, supplemental
2 OSS affidavit, that last sentence, "Additional
3 modifications." It would be on Page 41 of my
4 version. Have any of those modifications been
5 implemented? Or do you know of expected
6 implementation dates of those?
7 A. [SAMPSON] Could I have a moment?
8 Q. Sure.
9 (Pause.)
10 MS. CARPINO: Mr. Sampson?
11 A. [SAMPSON] The availability of the line-loss
12 report over EDI will be available in October.
13 Q. Are the other ones scheduled yet,
14 eliminating the change of class of service or -- I
15 guess that's the other one that is named here -- the
16 change to eliminate the class-of-service-type orders
17 from being eligible?
18 A. [SAMPSON] That will be December.
19 Q. And one final question: The way I read the
20 first sentence here is that these reports are not
21 transmitted over either NDM or EDI at this point?
22 A. [SAMPSON] That is correct. Excuse me, I
23 need to amend my answer. (Pause.)
24 There are two CLECs who receive this

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1 BY MR. GOLDMAN:
2 Q. I'm Marc Goldman, for WorldCom. Good
3 afternoon. I'm going to start with some of the
4 questions concerning volume. Mr. Salinger addressed
5 some of our questions, and we want to supplement
6 those. If you don't know the answers to these, we
7 may have to pose these as a record request as well.
8 I believe, Mr. Miller, that you referred
9 to a number of LSRs that were submitted in July in
10 Massachusetts?
11 A. [MILLER] Yes, I did.
12 Q. What was that number?
13 A. [MILLER] 48,000.
14 Q. Do you know how many of those were for
15 UNE-P?
16 A. [MILLER] Approximately 5,000.
17 Q. And do you know, of those 5,000, how many
18 were submitted by EDI?
19 A. [MILLER] No, I don't know the answer to
20 that.
21 Q. And of those 5,000, do you know how many of
22 those were for residential customers?
23 A. [MILLER] No, I don't know the answer to
24 that, either.

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1 Q. Do you know how many were for single lines,
2 as opposed to multiple lines?

3 A. [MILLER] No. You have the extent of my
4 knowledge about volume in that list.

5 Q. Of the remaining 43,000, what's the
6 breakdown of those between resale and UNE-L?

7 A. [MILLER] Approximately 25 and a half
8 thousand were UNE loops. That would include any DSL
9 orders as well. I don't know the breakdown between
10 loops and DSL. And just over 17 1/2 thousand were
11 resale.

12 MR. GOLDMAN: We would pose as a record
13 request to get the breakdown how many UNE-P orders
14 were submitted via EDI in July, how many UNE-P
15 orders were residential versus business, both of the
16 total UNE-P orders and of the ones submitted via
17 EDI, and how many of the UNE-P orders were new
18 orders as opposed to migrates.

19 MS. CARPINO: That will be proposed
20 Record Request W.

21 (RECORD REQUEST.)

22 Q. I want to turn your attention to the issue
23 of the GUI. There was some discussion with Mr.
24 Salinger about preorder availability. Let me first

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1 said that Bell Atlantic is now meeting that
2 standard. Prior to the May and June systems fixes,
3 there were some problems with respect to GUI
4 availability; is that correct?

5 A. [McLEAN] I am aware that there were
6 CLEC-reported incidents related to the GUI.
7 Sometimes when a CLEC reports a problem with the GUI
8 that appears as an availability problem it is in
9 fact a response-time slowdown problem. So I am now
10 certain that incidents reported in April were
11 specifically unavailability or were slowdown or
12 difficulty in connecting.

13 Q. There was a letter that was Attachment E --
14 that was your Attachment E to your supplemental OSS
15 affidavit, which was sent to the industry; right?

16 A. [McLEAN] Yes.

17 Q. In that it begins by saying, "BA is aware of
18 problems the CLEC community has experienced in
19 accessing the Web GUI. During the month of May
20 various CLECs experienced problems with the Web GUI
21 when accessing the GUI via the Internet. These
22 problems included timeouts, getting disconnected,
23 and slow performance. Slow performance also
24 occurred occasionally in June."

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1 ask: There's one GUI that serves New York and
2 Massachusetts; is that correct?

3 A. [McLEAN] Yes.

4 Q. And it's only CLECs who use the GUI to
5 access Bell Atlantic systems; right? Bell Atlantic
6 retail doesn't use the GUI?

7 A. [McLEAN] No, they don't.

8 Q. Is there more than one way for CLECs to
9 access the GUI?

10 A. [McLEAN] Yes, there are two methods. They
11 can access the GUI through the Internet or they can
12 access the GUI directly, by leasing a line and
13 getting a secure ID from Bell Atlantic.

14 Q. Are both of those methods supposed to work
15 comparably?

16 A. [McLEAN] Yes.

17 Q. Does Bell Atlantic advise CLECs that they
18 should use one of those methods, as opposed to
19 another method?

20 A. [McLEAN] Not that I'm aware.

21 Q. The FCC in its New York order emphasizes
22 that a 99.5 percent standard for systems
23 availability, and we were talking about that 99.5
24 percent standard previously, and I think Mr. Miller

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1 Bell Atlantic during that May and June
2 time period was still reporting somewhere around 99
3 percent GUI availability, was it not?

4 A. [CANNY] That's correct.

5 Q. So these problems that are referred to in
6 the letter didn't show up in the performance data;
7 correct?

8 A. [CANNY] Without looking at the specific
9 trouble logs, some may have. A slowdown in
10 performance is not considered an outage. It really
11 depends on each individual reported trouble in the
12 system.

13 Q. Now, WorldCom in our OSS declaration, the
14 declaration of Sherry Lichtenberg and John Sivori,
15 submitted a list of WorldCom trouble tickets as the
16 exhibit to that affidavit from December of '99
17 through June of this year, in which it showed GUI
18 availability to be 88.92 percent. Have you looked
19 at that log of troubles? And it goes through one by
20 one and says what the outages were, what the trouble
21 tickets that were submitted were. Has anyone looked
22 at that log?

23 A. [McLEAN] I have not.

24 A. [CANNY] I haven't.

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1 Q. So no one as of now disputes that any of the
2 outages here were accurate; correct?

3 A. [McLEAN] That's not what I'm saying. I'm
4 saying I haven't had an opportunity to review it.
5 And I would also say that the way that the measure
6 availability is defined and reported according to
7 the way it's defined in the carrier-to-carrier --
8 and we also work with the CLECs on what their
9 experience in using those interfaces are and report
10 those instances through the help-desk process. So
11 when those instances that are reported in the
12 help-desk process are reported as an outage, that is
13 reported as carrier-to-carrier. But every instance
14 that is reported from the help desk may or may not
15 be reported in the carrier-to-carrier metrics.

16 Q. If it's an outage, it would be reported in
17 the carrier-to-carrier metrics?

18 A. [McLEAN] Yes.

19 Q. And an outage is defined as?

20 A. [McLEAN] Interface unavailable.

21 Q. Meaning that the CLECs can't access the
22 interface?

23 A. [McLEAN] Yes. The GUI would be not
24 available to be used. So if you were a GUI user and

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1 the supplemental OSS affidavit, where Bell Atlantic
2 is reporting the impact of its fixes that it
3 implemented in May and June, that talks about
4 trouble tickets that are opened. Is that correct?

5 A. [McLEAN] Yes.

6 Q. And CLECs wouldn't open trouble tickets for
7 scheduled outages, would they?

8 A. [McLEAN] There's nothing to preclude a CLEC
9 from opening a trouble ticket on any question they'd
10 have.

11 Q. But ordinarily, if the outage was scheduled
12 in advance, it wouldn't -- most CLECs wouldn't open
13 a trouble ticket for that, would they?

14 A. [McLEAN] I don't know.

15 Q. Is Exhibit E meant to capture both scheduled
16 outages, the impact of the fixes with respect to
17 scheduled outages as well as unscheduled outages?

18 A. [McLEAN] Appendix E was a description of a
19 series of infrastructure changes that Bell Atlantic
20 made to the Web GUI environment in order to improve
21 response time and availability of that interface.
22 That's what that is. There's a summary by Verizon
23 of changes that we made to that environment.

24 Q. And it doesn't describe in there what the

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1 you wanted to log on to the GUI, you would not be
2 able to do so.

3 Q. Now, in WorldCom's exhibit we actually go
4 through and report both outages and slow-period
5 duration. It's the outages that we calculated to be
6 approximately 88-point-some percent. So I would
7 pose as a record request that you review that outage
8 report and indicate whether you disagree with any of
9 the outages that are reported on there.

10 MS. CARPINO: That's proposed Record
11 Request X. Is there a letter or number with that
12 attachment?

13 MR. GOLDMAN: It's the only attachment.
14 I think it's probably Attachment 1, but I can't
15 remember if we labeled it A or I.

16 (RECORD REQUEST.)

17 Q. I think it was Ms. McLean, that you
18 testified yesterday that scheduled outages are
19 included currently in the metric for measuring
20 outages; is that correct?

21 A. [McLEAN] That is Ms. Canny's testimony.

22 A. [CANNY] Yes, scheduled outages are not
23 excluded in the current reporting.

24 Q. Now, Exhibit E, where Bell Atlantic -- to

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1 scheduled outages were for July, does it?

2 A. [McLEAN] It has nothing to do with
3 scheduled outages.

4 Q. And Mr. Miller, when you reported that, I
5 believe it was in July, that the availability was
6 now 99.5 percent, was that including both scheduled
7 and unscheduled outages?

8 A. [MILLER] I was quoting from the carrier-to-
9 carrier metrics report for prime time, which I
10 believe is the case.

11 Q. When you say you believe it's the case, that
12 metric, as Ms. Canny indicated?

13 A. [MILLER] That's right.

14 Q. WorldCom on its logs has scheduled outages
15 on June 29th, June 30th -- actually two -- July 1st,
16 July 8th, July 21st, July 22nd, and July 23rd, as
17 well as unscheduled outages on July 8th, July 15th,
18 and July 20th. Now, I take it to meet a 99.5
19 percent availability for July, that would be in the
20 neighborhood of about three hours of downtime for
21 the whole month. Isn't that correct?

22 A. [CANNY] Prime-time availability, that would
23 be -- we're allowed about two hours of downtime --
24 during prime time, not Sundays.

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1 A. [McLEAN] Per server being measured. And in
2 some cases there is more than one server being
3 measured in that availability metric.

4 Q. And what's the impact of that?

5 A. [McLEAN] That there could be, if you summed
6 up outage notices, it could equal greater than 2.5
7 hours and still be within that tolerance.

8 Q. And how would that be?

9 A. [McLEAN] The denominator that's used of
10 available hours is driven by the number of servers
11 that are in a particular complex. As Julie
12 indicated, we look at the different access paths
13 that the CLECs have to a particular capability. So
14 in the case of a Web GUI there are four servers
15 behind a load balancing, and there is a server that
16 serves the direct-connect complex. So when we look
17 at availability, we look at both of those. We look
18 at the direct-connect complex, and we look at the
19 Internet complex. So if there was an outage on the
20 Web GUI side --

21 There could have been an outage on the
22 Web GUI side for two and a half hours through the
23 Internet and then an outage on the direct-connect
24 complex for two and a half hours and still make the

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1 A. [McLEAN] It depends. It depends what work
2 is being done during that scheduled outage. In
3 general, outages are scheduled for nonprime time.

4 Q. The outages that I listed before were all
5 during prime-time hours. So I'd pose a record
6 request of two things. One is whether you disagree
7 with any of those outages that I listed, that were
8 all beyond the June 27th fix; and secondly, what
9 Bell Atlantic calculates the availability to be in
10 July with respect to the Internet access to the Web
11 GUI.

12 MS. CARPINO: Proposed Record Request Y.
13 (RECORD REQUEST.)

14 Q. Ms. McLean, you just indicated that most of
15 the GUI outages occur during non-prime-time hours.

16 A. [McLEAN] That's not what I said. I said
17 planned outages are scheduled for non-prime-time
18 hours.

19 Q. I'm sorry. I'm only talking about planned
20 outages now. Will Bell Atlantic commit that in the
21 future all planned outages will be during
22 non-prime-time hours?

23 A. [McLEAN] When we have discretion in
24 scheduling the outages, we aim to schedule them in

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1 99.5 percent error rate.

2 A. [CANNY] Let me clarify: If there are four
3 paths, for example, two per GUI, and one path goes
4 down and impacts 25 percent of the CLECs, we would
5 take 25 percent -- and that's described in the
6 carrier guidelines -- of an outage. So in order for
7 the full outage, it would have to impact all CLECs.
8 If all CLECs were out, it would be 100 percent
9 outage. Otherwise it's prorated according to the
10 paths the CLECs are on. There's a lot of -- and I'm
11 not the best expert at describing the technical
12 terms. But there's a lot of common IP addresses
13 now, such that there's redundancy built into the
14 systems. But if we lose -- for instance, if someone
15 is only on one particular complex and we lose that,
16 it's apportioned across the whole industry.

17 Q. So if 80 percent of the CLECs are using
18 Internet access and the Internet access goes down
19 for two hours, that's weighted -- that is weighted
20 as 80 percent or --

21 A. [CANNY] 80 percent of two hours.

22 Q. And when there are scheduled outages, are
23 they affecting all of the access routes, or are they
24 only affecting particular access routes?

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1 non-prime-time hours. If there is a reason that we
2 feel it is important to take an outage, to make a
3 change to the environment during prime-time hours,
4 we would do that. Our objective is to provide the
5 highest service we can to the CLECs.

6 Q. When you have that discretion, would you try
7 to schedule them during the evening hours of
8 midnight to 6:00 a.m., as opposed to on Sundays? Or
9 are you generally going to schedule them on Sundays?

10 A. [McLEAN] Could you repeat the question?

11 Q. What I'm asking is whether for the scheduled
12 outages that you have discretion to control, when
13 you're aiming to do that in non-prime-time hours,
14 whether you would commit to doing that during the
15 evening hours of midnight to 6:00 a.m., rather than
16 on Sundays.

17 A. [McLEAN] We have a release schedule that
18 affects all of our applications across the company,
19 of which the wholesale systems are a part, and those
20 schedules take into account data-center issues,
21 application issues. And it is a large change-
22 control schedule that we run internally. These
23 system changes fit into that. So there are times
24 when there are changes made on Friday nights,

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1 Saturday nights, and Sundays.

2 Q. So I take it that the answer to my question
3 is no, that you can't schedule them focused on the
4 evening hours, that you have to have Sundays as part
5 of that, the implementation for those planned
6 outages.

7 A. [McLEAN] In general most release activity
8 happens at night. Sometimes the work that's being
9 done cannot be accomplished in a night, and it leads
10 over into Sunday day.

11 Q. Turning now to flow-through: The flow-
12 through metrics, at least for June, were somewhere
13 in the neighborhood of resale being 43.8 percent and
14 UNEs being 38.5 percent, significantly lower than
15 they were in New York at the time of the New York
16 application and at a particular point in time in New
17 York when we had significant CLEC experience. My
18 first question is whether every type of order that
19 flows through in New York also flows through in
20 Massachusetts?

21 A. [DeVITO] Marilyn DeVito. The flow-through
22 scenarios designed for New York also flow through in
23 Massachusetts.

24 Q. Every single one?

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1 on confirmed orders.

2 Q. So if there's a CLEC error, that doesn't
3 count against Bell Atlantic; correct?

4 A. [CANNY] It doesn't count one way or
5 another.

6 Q. Bell Atlantic also indicates that it made
7 many of the enhancements, or perhaps all of the
8 enhancements, that were promised in New York at the
9 time of its -- in October of 1999. What I'd like to
10 know is, sort of promised enhancement by promised
11 enhancement from that October of '99, whether those
12 enhancements have in fact been made?

13 MR. ROWE: Is there a reference point?

14 MR. GOLDMAN: Yes. I need a second to
15 find that.

16 MS. CARPINO: While Mr. Goldman is
17 looking for that, let me make a proposed record
18 request, Z for Verizon, provide us with the
19 CLEC-specific data, flow-through and reject results
20 from July of '99 through, I guess, the most recent
21 month -- June, if that's it, July if you have it,
22 2000. That will be Record Request Z.

23 (RECORD REQUEST.)

24 Q. I believe I found it. It's in the

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1 A. [DeVITO] To my knowledge, yes.

2 Q. So when KPMG in its report found that there
3 were certain documentation issues where Bell
4 Atlantic had said certain things were designed to
5 flow through, and KPMG found that they didn't flow
6 through, and then Bell Atlantic changed the
7 documentation to say that they didn't flow through,
8 that affected both New York and Massachusetts?

9 A. [DeVITO] Yes, it did. In the case of what
10 KPMG, where there were documentation issues, those
11 particular services were never designed to flow
12 through.

13 Q. I take it the converse is also true. What
14 you're saying is that the flow-through scenarios
15 should be designed to flow through exactly the same
16 in New York and Massachusetts. Is that correct?

17 A. [DeVITO] That's correct.

18 Q. Bell Atlantic in both of its OSS affidavits
19 attempts to blame CLECs for the low flow-through
20 rate. The question I have is, if an order is
21 rejected because of a CLEC error, that doesn't count
22 as an order which doesn't flow through; right?

23 A. [CANNY] That is not counted in the
24 denominator or the numerator. Flow-through is based

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1 supplemental affidavit, Paragraph 40. It says,

2 "WorldCom's comments best eliminate this issue. It
3 asks why Verizon has not raised the level of order
4 flow-through, as it said it would, by making the
5 system changes targeted last fall and discussed in
6 the OSS affidavit. In fact, those committed changes
7 were directed at the flow-through of UNE-P orders,
8 and they have had the planned and desired effect."
9 My question is if you could list what those promised
10 changes were and whether you have in fact made them.

11 A. [DeVITO] Yes, I can go through those
12 changes. In October of '99 we committed to five
13 changes. Of the five, four were completed as
14 scheduled. The one that we did not do, we did not
15 do based on consensus from the CLEC call that we
16 had. We were going to reject requests where the
17 listing address on the platform order did not agree
18 with the customer's service request, the CSR.

19 Q. And what were the four that you did do?

20 A. [DeVITO] Can-be-reached number on platform
21 order is invalid; BA retail blocking exists on line
22 and platform order; Call Forward 2 package
23 improperly placed on platform order; and invalid
24 blocking code for unauthorized NXX on platform

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1 order.

2 Q. So it's Bell Atlantic's view that it did not
3 promise last October to flow through supplemental
4 orders to cancel UNE-P orders?

5 A. [DeVITO] I didn't finish. That's what we
6 committed for in October.

7 In December we committed to six items.
8 Of the six, five are complete. One we did not do.
9 What we did instead is, we clarified a business
10 rule, and that was also done with consensus of the
11 CLECs on conference call.

12 Q. Could you list --

13 A. [DeVITO] Yes, I can. The first one that we
14 did not do, but we did clarify the business rules,
15 CLEC orders, partial migration on platform order
16 without properly identifying new VTN. Remake
17 ordered as part of platform. Additional listing
18 exists on account and platform order. Coin line
19 ordered as part of platform. CLEC orders marshal
20 migration of account on platform order. Call
21 Forward 2 package improperly placed on platform
22 order.

23 Q. Is that the complete list?

24 A. [DeVITO] No. We had also committed then

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1 October?

2 A. [DeVITO] We will flow through requests to
3 cancel an order when there is no internal service
4 order in our system for LSOG 4 in October.

5 Q. Now, for that last change, both with respect
6 to LSOG 4 and LSOG 2, when was the original -- and
7 by "the last change" I mean the change with respect
8 to supplemental orders to cancel. What was the date
9 that you originally committed to implementing that
10 change?

11 A. [DeVITO] In our affidavit we said we would
12 do it in the second quarter of 2000, and the New
13 York commission subsequently ordered us to complete
14 it by May 1st.

15 Q. Has the documentation with respect to the
16 October change been released?

17 A. [TOOTHMAN] I can try to answer that. The
18 October change being the flow-through?

19 Q. Yes.

20 A. [TOOTHMAN] I believe through change control
21 we issued the initiatives that will be done in
22 October.

23 Q. I want to turn now to Bell Atlantic's
24 service-order accuracy measure, which I believe is

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1 for the second quarter to do four enhancements. Of
2 the four, three are now complete. I will have to
3 explain one.

4 Account on platform order contains a
5 contract was done. CLEC-to-CLEC migrations on
6 platform order is complete. CLEC requests VTN
7 number change on platform order -- and I'll read the
8 English version: Supplemental order requesting
9 cancellation of platform order. On August 19th we
10 did the first phase of that. We will now flow
11 through supplemental orders received to cancel a
12 local service request in LSOG 2, for when there is
13 no pending order in our internal service-order
14 systems.

15 Q. Is there a second part of that?

16 A. [DeVITO] In October we will flow through
17 for LSOG 4 cancellation requests received when there
18 is no internal service order in our system.

19 Q. And when there is an internal service order,
20 I take it that will still not flow through after --

21 A. [DeVITO] That will not flow through at this
22 time.

23 Q. And when you say you're committed to doing
24 that in October, that means that you will do it in

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1 POR 6-01. Bell Atlantic in its declarations -- or
2 in its affidavits discusses this extensively,
3 because the numbers were quite low for many months,
4 and I guess there were a number of changes, and then
5 it went up to, I believe, 83 percent in June.

6 Explain to me, first of all, how Bell Atlantic
7 calculates that measure and what 83 percent means.

8 A. [CANNY] I'm sorry; which measure are we
9 talking about?

10 Q. It's POR 6-01.

11 A. [CANNY] You mean OR 6.01?

12 Q. I thought it was POR. I'm talk about the
13 service-order accuracy metric that Bell Atlantic
14 discusses in Paragraphs 67 and 68 of its
15 supplemental affidavit.

16 A. [CANNY] That's OR. Order accuracy
17 performance is evaluated by doing a sample study, by
18 comparing a service order to the initial requested
19 LSR for orders that are manually handled by a Bell
20 Atlantic representative.

21 Q. And what is it that you're comparing on the
22 LSR and the actually provisioned order?

23 A. [CANNY] We're comparing the order that was
24 entered in the system, and all the specific fields

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1 that are compared are articulated in the guidelines
2 in Appendix M to the carrier-to-carrier guidelines.
3 Q. That would include the features, for
4 example?
5 A. [CANNY] Yes.
6 Q. And the customer's phone number?
7 A. [CANNY] Yes.
8 Q. And the date that the order was provisioned?
9 Is that right?
10 A. [CANNY] The due date.
11 Q. The due date.
12 A. [CANNY] I can list off the fields.
13 Q. Okay.
14 A. [CANNY] The billed telephone number. The
15 RSID or ADCN. The PON number. The telephone
16 number; that's if it's applicable. Some services,
17 like a loop, it's not. The ported telephone number
18 if it's applicable. The circuit ID if it's
19 applicable. Directory listing information if it's
20 included on the LSR. E911 listing information if
21 it's included. Any features that are specified on
22 the LSR. The application date, the due date, and if
23 there are any specific remarks.
24 Q. Now, Bell Atlantic in recalculating the

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1 numbers for this metric, one of the things that it
2 blames the originally extremely low numbers on was
3 something having to do with a change in the dates.
4 Could you explain what that change in the dates was?
5 MR. ROWE: Do you have a reference
6 point?
7 MR. GOLDMAN: It's 67 and 68 in the
8 supplemental affidavit. I guess 68 talks about an
9 incorrect application date which did not result in
10 an incorrect due date.
11 A. [CANNY] We have service representatives --
12 do you want to do that?
13 A. [BARRY] Why don't you start.
14 A. [CANNY] The requirement for the application
15 date is the date that we received the valid LSR. If
16 a service representative had typed the order into
17 the system the next day, they were not overtyping
18 the day before on the LSR. We picked this up as an
19 error. It did not change the due date. It was that
20 the application date that they typed into the
21 service order was incorrect. Our system
22 automatically comes up with today's date when you're
23 typing into the system. They have to backdate that,
24 and methods and procedures and reviews have been

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1 done that I'll let Mr. Barry discuss.
2 A. [BARRY] Brian Barry. Back in the end of
3 May, when we identified this as a concern, we sat
4 down and revised a method to clearly identify what
5 the definition of an application date is. The
6 application date is the last clean version that an
7 LSR is received into the center. So if it is
8 received today at 9:00 in the morning and the rep
9 types it at 8:00 tomorrow morning or 5:00 this
10 evening, you're supposed to use 9:00 a.m. today, or
11 yesterday.
12 Q. When Bell Atlantic calculates its FOC
13 timeliness or its completion-notice timeliness and
14 reject timeliness, which of those two dates does it
15 use? Does it use the date that was originally on
16 the order, or does it use the date that the rep
17 typed onto the order?
18 A. [CANNY] All ordering information comes
19 directly off of the LSR, not on the service order.
20 Q. Now, after Bell Atlantic made these
21 corrections to the metric and took into account
22 things that it decided were not service-impacting,
23 the numbers still show in Paragraph 68 that 91
24 percent of resale orders, 94 percent of platform

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1 orders -- so I guess 9 percent of resale orders and
2 6 percent of platform orders the LSR, the completed
3 order was different than the LSR. Is that correct?
4 A. [CANNY] That's correct. And I'd like to
5 clarify what "different" means. Sometimes
6 "different" does not mean that it's incorrect. A
7 representative may actually use different USOCs for
8 combinations that mean and provide the same service
9 as what was on the LSR. Our reviewers were
10 instructed to look for specific matches, and we've
11 worked to make sure they understood all of the
12 service-order rules, such that they would score
13 something as different and correct. Additionally,
14 if they were correcting information on the LSR
15 because these were orders that were manually held,
16 we were counting some of those as errors when in
17 fact they were corrections.
18 Q. I take it, though, that Bell Atlantic
19 attempted in all of the things described in the
20 prior two paragraphs to recalculate this metric so
21 it best reflected the accuracy of the service order,
22 including taking out what it called technical
23 mismatches; right?
24 A. [BARRY] There are times when the rep works

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1 on these orders. For example, if the CLEC or
2 reseller submits a request for a residential line,
3 resale, and they request TTR, which stands for
4 touch-tone, and they send it in as TTB, which
5 represents business, is a business class of service,
6 instead of querying it back unnecessarily and
7 possibly missing the due date, although it's a
8 mismatch, because you're not seeing it as TTR, we're
9 providing you the same service and we're not sending
10 back an unnecessary query, which could delay
11 service.

12 Q. Well, I believe that was already taken into
13 account. If you look back in Paragraph 68, it says,
14 "Importantly, the metric still treats all
15 mismatches, even those that were actually
16 corrections by a Verizon service representative and
17 eliminated a rejection to the CLEC, are scored as an
18 error. After correcting for both of these factors,
19 Verizon's June results are as follows." Then it
20 lists those results.

21 A. [CANNY] That's correct.

22 Q. In the discussion of loops yesterday
23 morning, there was some discussion of something
24 called ISO 9000 and the fact that Bell Atlantic was

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1 Q. It's a measurement of how do you the process
2 for releasing that documentation.

3 A. [McLEAN] Yes.

4 Q. Has there been any external audit done as to
5 whether you comply with these SEICMM practices?

6 A. [McLEAN] We have brought in external groups
7 that are certified to do those assessments. We have
8 done informal assessments. It is a multimonth and
9 expensive process to do a formal assessment, and we
10 felt we derived sufficient value from having gone
11 through the process, established the parameters, and
12 gone through the internal -- or what they call a
13 quick-map assessment of our practices instead of a
14 full-blown assessment.

15 Q. That internal assessment, did that produce a
16 document reviewing your procedures?

17 A. [McLEAN] Not that I'm aware of. It
18 produced a presentation by the vendor doing the
19 assessment to the affected software development
20 groups.

21 Q. That presentation didn't take the form of
22 any sort of written documentation?

23 A. [McLEAN] No.

24 Q. It was entirely verbal?

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1 trying to make -- was or had made its hot-cut
2 procedure ISO 9000-compliant. ISO 9000, I believe,
3 is a certification process with respect to
4 documentation procedures and so forth. Does anybody
5 know whether Bell Atlantic's business rules and EDI
6 versions are ISO 9000-compliant?

7 A. [McLEAN] ISO 9000 is a quality measure for
8 a process. In Bell Atlantic we have subjected our
9 data operations group to ISO 9000 certification.
10 That's the actual operation of the computers in the
11 data centers as it relates to software development.
12 Where business rules and EDI documentation come into
13 play, the prevailing quality standard there is set
14 by the Carnegie-Mellon Institute for Software
15 Engineering Institute capability maturity model,
16 also called SEICMM. And Bell Atlantic's software
17 development groups have adopted SEICMM practices for
18 the development and delivery of software, and we
19 have done internal assessments that bring us to
20 Level 2. So the documentation is part of that
21 overall process. But that's documentation about how
22 we do our function, and that's also what ISO 9000
23 measures. It's not a measurement of document
24 quality.

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1 A. [McLEAN] There were probably PowerPoint
2 slides. I was not at the session.

3 MR. GOLDMAN: We would make a document
4 request to get any PowerPoint presentation that was
5 made with respect to compliance with the SEICMM
6 practices.

7 MS. CARPINO: That will be proposed
8 Record Request AA.

9 (RECORD REQUEST.)

10 Q. Bell Atlantic has a CLEC test environment,
11 or CTE, that CLECs use to test new versions of
12 interfaces. There's a document about the CTE and
13 the rules for the CTE in New York. This is just a
14 point of clarification: We've heard some rumors
15 that Bell Atlantic didn't have long-term plans to
16 keep the CTE available, at least in Massachusetts.
17 I just want to confirm that the CTE will continue to
18 be available for future software releases in
19 Massachusetts.

20 A. [McLEAN] Yes.

21 Q. There was some discussion earlier this
22 morning of the issue of SNPs, or suspension for
23 nonpayment. And there was a billing fix that I
24 believe had been made to avoid suspension for

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1 nonpayment. One of you said that there was a fix
2 that went in, was it last weekend?
3 A. [MILLER] Yes, that's correct. I think I
4 made that statement. Mr. Sampson confirmed it.
5 A. [SAMPSON] Could you repeat the question?
6 Q. Mr. Sampson, was there a fix that went in
7 last weekend for SNPs, or suspension for nonpayment?
8 A. [SAMPSON] Yes, there was.
9 Q. What was the exact date on that?
10 A. [SAMPSON] I believe it was Saturday, the
11 18th of August.
12 A. [McLEAN] The 19th.
13 A. [SAMPSON] The 19th.
14 Q. The 19th of August. And was there any
15 notification to the industry that that fix was going
16 into effect?
17 A. [TOOTHMAN] I think through change control,
18 that was on our August project list.
19 Q. Any other notification of which you're
20 aware?
21 A. [TOOTHMAN] No.
22 Q. So if we look at the August project list, it
23 should be there.
24 A. [TOOTHMAN] Yes.

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1 Q. Ms. McLean, you discussed earlier this
2 morning the GUI fixes that had been made in May and
3 June and notification with respect to those. I
4 believe you indicated that infrastructure changes
5 don't require notice; is that correct?
6 A. [McLEAN] Infrastructure changes that do not
7 require any change on the part of the CLEC are not
8 managed through change control.
9 Q. Are software changes managed through change
10 control?
11 A. [McLEAN] Yes, software changes that affect
12 the interfaces to the CLEC, so if the CLEC has to
13 make a change to the interface they use to provide
14 information to us, that is managed through change
15 control. In addition, Mike provides notification
16 proactively of other changes that we're making that
17 are just informational to you, that don't require
18 the CLECs to make software changes on their side.
19 Q. So I take it, then, that it's Bell
20 Atlantic's view that if there's a change to the GUI,
21 since the GUI doesn't require software changes on
22 the CLEC side, that doesn't require notification.
23 Is that your position?
24 A. [TOOTHMAN] No, that's not our position.

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1 GUI changes -- it is our practice to announce GUI
2 changes through change control, like the format and
3 the touch and feel of the GUI and things like that.
4 Q. But the particular GUI changes that were
5 made in Exhibit -- that are discussed in Exhibit E
6 to the affidavit, those were not announced until the
7 July 25th letter to the CLEC community; is that
8 correct?
9 A. [TOOTHMAN] Right. Again, those changes
10 described in Attachment E, to understand them, are
11 infrastructure changes that didn't impact the way
12 you interface with the GUI. So those are not the
13 kind of changes that we would announce through
14 change control.
15 Q. And I take it the same would be true if
16 those were software changes, because if they were
17 software changes that didn't affect the way that the
18 CLECs input the information into the GUI, that
19 wouldn't be announced through the change control
20 either?
21 A. [TOOTHMAN] True.
22 Q. I want to turn now to the issue of
23 expressTrak. Has Bell Atlantic rolled out -- and
24 expressTrak, as we understand it, is the major

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1 system change which will affect both billing and
2 ordering and will require changes to the service-
3 order processor, also affect the CSR structure for
4 preorder. Has Bell Atlantic rolled out expressTrak
5 anywhere at this point for its retail side?
6 A. [TOOTHMAN] ExpressTrak has been deployed in
7 the states of Maryland, Virginia, West Virginia, and
8 DC for retail.
9 Q. When did it begin rolling it out for retail?
10 A. [TOOTHMAN] I would say approximately second
11 quarter, first or second quarter, '99.
12 Q. Has it begun its rollout of expressTrak for
13 CLECs?
14 A. [TOOTHMAN] Yes. Currently we have
15 implemented expressTrak for some wholesale customers
16 in those jurisdictions.
17 Q. In each of those jurisdictions?
18 A. [TOOTHMAN] I'm not sure about West
19 Virginia, but I can -- for Maryland and Virginia for
20 sure. I'm not sure about DC and West Virginia.
21 Q. Prior to beginning its rollout in those
22 states, did Bell Atlantic provide any sort of
23 rollout schedule?
24 A. [TOOTHMAN] For wholesale?

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1 Q. For CLECs.

2 A. [TOOTHMAN] CLECs? No, we negotiated with
3 the CLECs individually on implementing expressTrak
4 for that individual CLEC.

5 Q. And you didn't provide documentation
6 through -- you didn't manage it through the
7 change-control process, did you?

8 MR. ROWE: This has got nothing to do
9 with Massachusetts at this point.

10 MR. GOLDMAN: It will, and it does.

11 MR. ROWE: Arguments about change
12 control for Maryland, DC, and Virginia don't have
13 anything to do with Massachusetts, that I can tell.

14 MR. GOLDMAN: It's a general argument
15 that Bell Atlantic is not complying with its
16 change-control process with respect to a major
17 systems release, that expressTrak will soon be
18 implemented in Massachusetts as well. It's
19 extremely important that Bell Atlantic comply with
20 that process, provide us the documentation we need.

21 MR. ROWE: Let me be clear: We have no
22 problems with questions about Massachusetts. The
23 application of change control in other states is
24 irrelevant to this proceeding.

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1 CLEC. So there's a large portion of implementation
2 of expressTrak that's done individually with CLECs,
3 but those pieces of the rollout which do apply to
4 change control will be managed through change
5 control.

6 Q. So there will be a CLEC comment period with
7 respect to documentation?

8 A. [TOOTHMAN] We'll follow the change-control
9 practices for those changes that do apply to change
10 control, which would include all aspects of the
11 change-control process.

12 Q. And what I'm asking you specifically is:
13 With respect to expressTrak documentation, will
14 there be a CLEC comment period?

15 A. [TOOTHMAN] When you say expressTrak
16 documentation, as far as business rules, then that
17 is a change-management practice, to provide
18 business-rule changes and allow the comment cycle.

19 Q. And will Bell Atlantic be running the
20 regression test deck that it will release to the
21 CLECs?

22 A. [TOOTHMAN] For expressTrak?

23 Q. Yes.

24 A. [TOOTHMAN] I'm not sure of that.

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1 MR. GOLDMAN: It's directly relevant if
2 Bell Atlantic isn't complying with the process in
3 these other states to show what it's likely to do in
4 Massachusetts and to see whether it's committed to
5 doing it.

6 MS. CARPINO: I have to agree, it's a
7 bit of a stretch, Mr. Goldman. Let's move along.

8 Q. Let me ask this: When is Bell Atlantic
9 planning to roll out expressTrak in Massachusetts?

10 A. [TOOTHMAN] Well, we had previously
11 announced a plan for fourth quarter, 2000. That was
12 based on the general plans of our retail lines of
13 business. Since then the retail lines of business
14 have deferred their rollout plans in Massachusetts.
15 So we are currently reassessing our plans to roll
16 out expressTrak for wholesale customers in
17 Massachusetts. So we do not have a firm plan to
18 roll it out.

19 Q. When Bell Atlantic does roll it out, is it
20 planning to handle the expressTrak release through
21 change control?

22 A. [TOOTHMAN] There are lots of aspects of the
23 rollout, as I said a minute ago, about negotiating
24 with the individual CLEC, of rolling it out to the

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1 Q. Will you commit to running it here, or you
2 don't know whether you can commit to that?

3 A. [TOOTHMAN] You need to get into the whole
4 aspect of the regression test deck and what it
5 applies to. The CLEC testing applies primarily to
6 the preordering interface and the ordering
7 interface. So the impact of expressTrak on the
8 interface as a back-end system doesn't directly
9 relate to a CLEC test deck.

10 Q. So I take it your answer is no, then, that
11 you won't commit to running such a test deck with
12 respect to the expressTrak changes?

13 A. [TOOTHMAN] My answer is I haven't reviewed
14 that.

15 Q. Will you commit to a CLEC testing period
16 prior to implementation of expressTrak for CLECs?

17 A. [TOOTHMAN] I think my answer is the same as
18 the test deck itself. I haven't had those
19 discussions.

20 MR. GOLDMAN: That's all that I have.

21 MS. CARPINO: Are there other WorldCom
22 questioners?

23 MS. KINARD: If I could ask some
24 questions.

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1 CROSS-EXAMINATION

2 BY MS. KINARD:

3 Q. Just picking up on this issue first about
4 the change control. This involves both the
5 change-control people and the measurements for
6 change control.

7 Right now you have a proposal in another
8 proceeding not to bring the change-control remedies
9 from New York into Massachusetts for carriers
10 operating in New York.

11 MR. ROWE: That is a PAP proposal?

12 MS. KINARD: I have a question about
13 whether the CT testing in Pennsylvania is picked up
14 under that plan, whether the metrics that you use in
15 New York pick up the whole region.

16 A. [CANNY] From the perspective of the data
17 that we report, regardless of -- aside from remedy
18 discussions, the measures that we report, we report
19 the notification of the business rules and software
20 release. All that change-management notification is
21 essentially the same across the footprint. From the
22 perspective of the test-deck directions themselves,
23 I believe -- and I'll let Ms. McLean clarify that --
24 that we have separate test-deck performance because

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1 with the code as we leave CTE as we have when we
2 migrate the code to production.

3 The first test deck we created was an
4 LSOG 2 test deck for New York. With our LSOG 4
5 implementation, we added an LSOG 4 test deck for New
6 York. We have also created a Massachusetts test
7 deck for LSOG 2 and LSOG 4. And as Ms. Canny said,
8 for Massachusetts we expect the results to be the
9 same. Any variability between running the deck in
10 New York and running the deck in Massachusetts I
11 would attribute to the account setup of the test
12 data. But we do run the test decks in New York and
13 we run the test decks in Massachusetts. We have
14 also created test decks for Maryland.
15 Pennsylvania -- and there's five.

16 A. [TOOTHMAN] New Jersey.

17 A. [McLEAN] And New Jersey.

18 Q. And so for metric purposes for those states
19 it would depend on the test deck for that state.

20 A. [McLEAN] It is essentially the same test
21 deck. The thing that is different is the data.

22 A. [CANNY] The accounts might be different,
23 but there would be separate -- that one measure, the
24 test-deck validation, not the others, would impact,

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1 we have separate test decks in different state
2 jurisdictions. So while essentially they're testing
3 the same things, the accounts that are being tested
4 in Massachusetts are Massachusetts accounts. So
5 it's possible, though unlikely, that performance
6 might be different.

7 Q. So we could test the test deck in
8 Massachusetts and it wouldn't show up in those New
9 York metrics, like our deck we just did in
10 Pennsylvania, where we had all the problems -- in
11 Pennsylvania, where we had problems, but the New
12 York metric looked okay for June. You sound like
13 each state would have its own software certification
14 metric.

15 A. [McLEAN] Let me give context to the test
16 decks. The test deck we call a software quality
17 validation test deck, that is a series of preorder
18 and order scenarios. In order to execute the test
19 deck, we have to set up test data, and we set up
20 test data in the CTE, the CLEC test environment, and
21 also comparable accounts in the production
22 environment, because we run the test deck in the
23 CTE, then we run it in production, and we compare
24 the results. So we want to have the same experience

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1 as the software quality would be state-specific.

2 Q. And the accounts wouldn't show up issues in
3 the software quality?

4 A. [McLEAN] Definitely, in running the test
5 cases, it exercises the software. So if there are
6 software defects, the test cases will not pass.

7 Q. I'm not sure if I got to the point
8 whether -- so if the deck fails in New York -- I
9 mean, passes in New York, it should pass everywhere,
10 in other states, except for the accounts? And the
11 accounts tell you nothing about the software?

12 A. [McLEAN] We run the test deck in each
13 jurisdiction. We expect the results to be the same
14 in running that test deck five times -- or,
15 actually, there's, I believe, eight decks. There's
16 five jurisdictions, LSOG 2 in some, LSOG 4 in
17 others. We expect the results of running the LSOG 4
18 deck to be the same regardless of the jurisdiction
19 it's being run in. That is our expectation. We
20 expect to pass all the test cases. That is our
21 expectation.

22 MR. GOLDMAN: Perhaps I can cut through
23 this by asking one clarifying question. I take it
24 what you're saying is the metric reports different

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1 results for every state and if the account
2 structure -- as a result of a defect in the account
3 structure or something wrong with the account, you
4 get different results in Pennsylvania and New York.
5 that should show up as different results in the
6 metric for Pennsylvania and New York. Correct?

7 WITNESS CANNY: That's correct.

8 Q. Going on to another question: On the GUI
9 availability, where you tested it with Enview: Do
10 you test that through the full prime-time
11 availability, or just until 6:00 o'clock or 7:00
12 o'clock at night?

13 A. [CANNY] We test it 24 hours a day. All OSS
14 availability from an Enview perspective is 24 hours
15 a day.

16 Q. Now, from what you said, because of the
17 different routes, if one route's down and you just
18 take 25 percent off the downtime in doing the
19 total --

20 I want to make sure I understand.

21 A. [CANNY] That's from a CLEC-reported outage
22 that we do an apportionment based on recorded
23 outages. The Enview transactions are going over the
24 primary routes.

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1 Q. But your final report, whenever a CLEC
2 reports its own individual outage, that only gets a
3 25 percent rate?

4 A. [CANNY] If they're the only ones who report
5 it, that would be correct. If others reported it,
6 it would be higher.

7 Q. So if it's the same CLEC having problems
8 over and over again that would have caused you to
9 fail the 99.5 percent ratio if it was counted across
10 the board, that one CLEC's problems could be left
11 out of that calculation because you do it in
12 aggregate for system availability?

13 A. [CANNY] No, a single CLEC's outages are
14 included in the total outages.

15 Q. But it's only at 25 percent.

16 A. [CANNY] If a CLEC was out for ten hours, 25
17 percent of that ten hours would be two and a half
18 hours, and that would be enough to impact the
19 performance results.

20 Q. The next question is on your paragraph, I
21 think it was No. 47 on flow-through, the metric on
22 how we're still working in New York to finalize it.

23 MR. ROWE: We need a reference point.
24 We're not sure what affidavit Ms. Kinard is

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1 referring to.

2 MS. KINARD: It's Page 17, No. 47, and I
3 think it's of the performance measurements. "Bell
4 Atlantic has worked collaboratively with members of
5 the" --

6 A. [CANNY] It's the original affidavit?

7 Q. Yes, it's the original affidavit. It was
8 Paragraph 47 of the original measurements affidavit,
9 Page 17.

10 In looking at the measurements, you
11 haven't been reporting design to flow-through in
12 Massachusetts. It sounds like you're waiting for
13 this to be finalized in New York, but my
14 understanding is the New York carrier-to-carrier
15 rules are set, we're just talking about changing
16 them.

17 A. [CANNY] And your question? I don't
18 understand what your question is?

19 Q. Well, first of all: Am I correct that
20 you're not reporting design to flow-through in the
21 carrier-to-carrier reports for Massachusetts?

22 A. [CANNY] Flow-through achieved?

23 Q. Flow-through achieved.

24 A. [CANNY] I don't believe we have reported

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1 flow-through achieved yet for Massachusetts.

2 Q. And it sounds like from this paragraph
3 you're waiting for New York to resolve these issues
4 in six months?

5 A. [CANNY] At the point in time when this
6 affidavit was filed, I believe we had hope of
7 closure of the issue of OSS, of flow-through.
8 Subsequent to that it became a nonconsensus item in
9 New York, and I believe all parties will be filing
10 their comments on that Friday. The issue of the
11 metric definitions, the exclusions are not as clear.
12 We have reported some performance in New York, but
13 there's a lot of disagreement as to what can be or
14 cannot be excluded. Consequently, in our
15 interpretation, I don't really have a complete list
16 of exclusions. I've got Marilyn here, who can
17 validate that.

18 A. [DeVITO] For Massachusetts, the chief
19 metric is a rather difficult metric, first of all,
20 because we have to be able to identify all the
21 incoming LSRs as to their eligibility and whether or
22 not they were ever designed to flow through. That's
23 an enormous task. That effort is still basically
24 underway.

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1 When we determine what we can include or
2 exclude, we have to set indicators to say this is
3 one that is eligible or this one is not. We have
4 not yet completed that.

5 Q. So you couldn't use the same exclusions in
6 the New York metric here now, where you can exclude
7 pending orders and you can't exclude some of the
8 other....

9 A. [CANNY] We have done some preliminary work
10 on reporting the flow-through achieved metric, but
11 because we do not have consensus or a clear
12 definition of all the exclusions, we have not done
13 so, because in my opinion the measure is still --
14 it's very much under development even from a
15 definitional perspective.

16 So I could put out a number, but I'm not
17 sure all the parties would agree that it meets the
18 definition, and that's the open issue here.

19 Q. I guess my point is that in New York there
20 is enough definition to report it, and I know we've
21 been waiting from the consolidated arbitrations a
22 long time for a flow-through metric, from that
23 metric proceeding. I'm just wondering when we're
24 going to see the achieved flow-through metric in

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1 never identified. And that would really be your
2 differences.

3 Q. Thank you.

4 A. [DeVITO] You're welcome.

5 Q. What I think will be my final question:

6 Paragraph 53 of the same supplemental comments on
7 measurements: This is under the order accuracy
8 measurement that our attorney had asked you about.
9 You had said for some of the date problems you found
10 that that wouldn't affect the FOC metric or the
11 total interval.

12 A. [CANNY] The order-confirmation intervals
13 come from dates that are stamped on the LSR or the
14 completion notices themselves. I didn't say
15 anything about the service-order input itself. A
16 change to the application date, by moving it out a
17 day, would impact the provisioning interval, but not
18 the LSRC or the completion-notice interval.

19 Q. So this would mean that those errors could
20 cause missed reporting on the orders that fell to
21 manual on the intervals, and according to this
22 paragraph, affect the due date we got because of --

23 A. [BARRY] It's not true. The application
24 date is the day the last clean version comes through

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1 Massachusetts.

2 A. [CANNY] I believe there's a record request
3 that was discussed yesterday on under-development
4 dates, and that would be included in that.

5 Q. And you don't know that now?

6 A. [CANNY] No, I don't.

7 Q. And Marilyn, I just wanted to follow up:
8 Before you were asked whether what flows through in
9 New York flows through in Massachusetts, and you
10 said what was designed to flow through is the same.

11 A. [DeVITO] Uh-huh.

12 Q. But it sounds like now the system error
13 message that causes things to drop out to manual may
14 be different for Massachusetts?

15 A. [DeVITO] No. The functionality that's
16 designed to flow through is the same for New York
17 and New England, basically. The functionality is
18 designed for all. The only differences that there
19 would be is, each state does have some unique
20 products and services, particularly in the resale
21 environment, and therefore there could be some
22 instances where a particular product or service in
23 Massachusetts is not yet designed to flow through
24 because it never existed in New York and so it was

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1 the system, to the center. So although the
2 application date may not have matched up, which was
3 on the LSR, it never impacted in those instances the
4 actual due date or the delivery of service.

5 Q. So when this paragraph says that the rep
6 counted out the five days from a SMARTS clock date
7 on the date they typed in the later date, not the
8 real date in the order, that that pushed the
9 interval -- it sounds like from this it does push
10 the due date out.

11 MR. ROWE: There's references here to
12 two different affidavits and two different periods
13 of time. The one you're referring to now is the May
14 affidavit. The one Mr. Barry is addressing is the
15 August affidavit. So on this reference let Ms.
16 Canny answer and we'll be clear on what the
17 affidavit --

18 A. [CANNY] Correct. If the service
19 representative changes the requested due date by
20 counting out and making a date -- instead of being
21 Thursday the 12th, he makes it Friday the 13th,
22 you're correct, they would actually change the due
23 date. This is something that we've addressed and
24 why it is counted as an error.

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1 A. [BARRY] What you're referring to is, there
2 was a training issue in the center, which we
3 addressed in the affidavit, about application date
4 and also due date. There were some concerns or
5 misinterpretations in the centers on hot cut and
6 loop, that it's five business days from the last
7 clean version -- or from when the order is being
8 typed into the system, not when it was the clean
9 version came into the center.

10 So we passed that on. We trained the
11 centers. By June 3rd of this year every rep in the
12 centers had been trained in the correct process.

13 Q. I would like to know if for the months prior
14 to June data reporting, if some of those cases got
15 into the metrics, when we got maybe a six-day
16 interval it was counted as a five-day interval
17 because of this date-change issue.

18 A. [CANNY] Let me clarify the issue. If we
19 moved a due date out by a day and instead of it
20 being five days we made it six -- let's say they got
21 the application date is today and they added -- the
22 application date was the 12th and they had a
23 five-day interval, making it the 17th, or the 18th,
24 whatever -- I can't count my days here; I'm a math

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1 A. [CANNY] It's all explained in the
2 affidavit.

3 A. [ABESAMIS] Right. It's fully explained in
4 the affidavit. But further along, what we did is,
5 we took a look at those LSRs where the confirmations
6 did not match the requested due date, and two main
7 themes flow through in that area, which was: One,
8 we gave a due date a day later, and when we checked
9 those orders, those orders were received after 3:00
10 p.m., and according to our business rules, or our
11 interval rules, I should say, we would be entitled
12 to provide that as a due date of the next day. The
13 second instance was, in the case where the standard
14 interval was not asked, where the date was less than
15 the standard interval, so we published the standard
16 interval day.

17 Q. You mentioned the 3:00 p.m. date in the
18 rules. As I remember from New York, you had that
19 rule. KPMG found that you didn't do that anyhow, so
20 you took that out of the rule. So I don't know if
21 it applies when you bring the New York metric down
22 to Massachusetts.

23 A. [CANNY] No, the issue in New York and KPMG
24 was, our original set of guidelines said that we add

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1 major -- the interval measured would be the actual
2 interval given, which would have actually been
3 longer than what the CLEC requested.

4 On the other hand, if the application
5 date was the error and they put on a date that was a
6 day later and kept the requested due date, the
7 interval would have been shorter than what was
8 requested. From a reporting perspective we saw both
9 of those instances. I can't tell you specifically
10 what the impact on the metrics was. This was a
11 small portion of orders in a sample study, not the
12 entire universe.

13 Q. But you can project percentages by the
14 sample size and how many this might have affected
15 either way?

16 A. [ABESAMIS] Maybe I can answer. Beth
17 Abesamis. In our supplemental filing of the
18 measurements affidavit on August 4th, we had done a
19 study on LSRs that were submitted to us, basically
20 saying are we providing a confirmation back with a
21 date that the CLECs are requesting? And we did over
22 27,000 LSRs, and we were matching the requested due
23 date over 95 percent of the time. That was the
24 month of June.

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1 time to the interval and we changed the performance
2 metric, and that's not the case. What we do is, the
3 due date that we offer is articulated in the
4 guidelines and the CLEC adds the time. We don't add
5 anything. It had nothing to do with adding. The
6 3:00 p.m. cutoff has not changed, and it's the
7 same --

8 Q. And that's still in the New York guidelines?

9 A. [CANNY] It's still in the New York
10 guidelines, and it applies to Massachusetts.

11 MS. KINARD: Thank you.

12 MS. SCARDINO: May I ask two followup
13 questions?

14 MS. CARPINO: Yes.

15 CROSS-EXAMINATION

16 BY MS. SCARDINO:

17 Q. When a CLEC submits an order, is that
18 considered day zero or day one?

19 A. [CANNY] Day zero.

20 Q. For purposes of your interval. So if a CLEC
21 submits an order, it's a five-day interval, is that
22 interval actually five and a half or six days,
23 because when the CLEC's putting the order in it's
24 actually day zero?

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1 A. [CANNY] If I had tomorrow as an interval,
2 that would be a one-day interval. Today would be
3 zero.

4 Q. If a CLEC submits an order, it's called day
5 zero.

6 A. [CANNY] That's correct.

7 Q. And your intervals start upon receipt of a
8 valid order; is that correct?

9 A. [CANNY] That's correct.

10 Q. So if a CLEC submits an order and there is
11 an error on the order and Bell Atlantic sends it
12 back, when the CLEC sends it back and it's
13 corrected, in Bell Atlantic's view, that's the start
14 date of the interval.

15 A. [CANNY] That's correct.

16 Q. What happens if Bell Atlantic queries the
17 CLEC back and says, "There's a problem with this
18 order." and that happens, again, on day zero, the
19 same day; and upon research, the CLEC finds that
20 actually it was really a Bell Atlantic error, that
21 Bell Atlantic, the rep either misinterpreted
22 something or the CLEC had actually had a valid
23 order. Does that date then get changed, if that
24 happened on the next day, which would basically be

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1 the testing process last year and it began in New
2 York around the September time frame? I think you
3 had something that was called a "September
4 solution." Is that correct?

5 A. [McLEAN] Yes.

6 Q. And that testing environment is basically
7 the environment that we're talking about that you
8 use now throughout the region; is that correct?

9 A. [McLEAN] We established an environment in
10 September for New York. We extended the environment
11 itself for these other jurisdictions subsequent to
12 that.

13 Q. And so how do you measure your performance
14 each month using this test environment? When CLECs
15 use the environment and use the test deck, how is
16 your performance measured?

17 A. [McLEAN] The software quality validation
18 test deck is used to measure the quality of a
19 CLEC-impacting release. So the way we use the test
20 deck is, we run the test deck when we open the
21 environment for the CLECs to begin their testing in
22 that environment, and we publish the results. We
23 continue our testing while the CLECs are also
24 testing, and each week we publish an update to the

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1 day one?

2 A. [CANNY] No.

3 Q. So it has no impact on the interval or start
4 of the metrics?

5 A. [CANNY] The metric still starts up when we
6 get the response to the query.

7 Q. So there could be instances, then, where
8 Bell Atlantic believes there's an error on the
9 account but subsequently we find out there's
10 actually not an error, but the interval doesn't get
11 started until all of that's rectified.

12 A. [CANNY] That's correct.

13 Q. Let's go back to the test-deck questioning.
14 You testified, I believe, that you used the same
15 test deck throughout the region; is that correct?

16 A. [McLEAN] I don't know what you mean by "the
17 same test deck."

18 Q. The quality-assurance test deck was
19 developed.

20 A. [McLEAN] Yes, we have a software quality
21 validation test deck, and we have a specific
22 instance of that test deck across five
23 jurisdictions.

24 Q. Would it be fair to say that you developed

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1 testing results.

2 We then run the test deck a final time
3 at the close of the release, so to speak. We run it
4 in CTE. We migrate the code to production. We run
5 the test decks again in production, and we publish
6 those results.

7 Q. Right, but is there a performance metric in
8 your carrier-to-carrier guidelines that measures
9 some part of the testing process?

10 A. [McLEAN] Yes. There is a measure --

11 A. [CANNY] PO 6-01.

12 Q. Are you reporting any data in New York on
13 that metric?

14 A. [CANNY] I believe the June -- some measures
15 have been reported since January. The rest were
16 reported with the June release. So to the extent
17 that -- I believe the software validation was June,
18 and I'd have to check on that.

19 Q. So in New York the first time you reported
20 data for PO 6 would be for June?

21 A. [CANNY] The June release, I believe.

22 Q. So would you have reported your performance
23 for June, the June carrier-to-carrier data?

24 A. [CANNY] I believe so.

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1 Q. And why, then, do we not have any data for
2 Massachusetts for this same metric, which is PO 6?

3 A. [CANNY] We're filing that in a revision.
4 We did not have the test-deck results for
5 Massachusetts when we filed our report.

6 We did not have the data when we filed
7 the June report. We are filing a correction with
8 that data report.

9 Q. And when will that filing be made?

10 A. [CANNY] If not today, tomorrow. There are
11 other measures that are being put in as well.

12 MS. SCARDINO: Thank you. I have no
13 additional questions.

14 MS. CARPINO: Let's continue on with
15 WorldCom questions.

16 CROSS-EXAMINATION

17 BY MS. LICHTENBERG:

18 Q. I have just, I think, two questions
19 regarding the GUI, because I've gotten a little
20 confused. Ms. McLean, I believe you said there is a
21 single GUI that addresses the entire Bell Atlantic
22 region; is that correct?

23 A. [McLEAN] Yes.

24 Q. Can you help me understand why, then, an

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1 A. [CANNY] Yes.

2 Q. Or a system availability?

3 A. [CANNY] Yes.

4 Q. And what are the current metrics for system
5 availability in New England?

6 A. [CANNY] Everything under the measure of
7 PO 2, which is OSS interface availability. We've
8 reported for EDI, CORBA, RETAS, and the Web GUI.

9 Q. So let me just make sure I understand, since
10 I was not a math major. When I read the metric on
11 the GUI availability, on the OSS availability, I am
12 looking at a specific metric for Massachusetts,
13 which wouldn't necessarily match a metric for New
14 York or part of the other regions; is that correct?

15 A. [CANNY] It may match, depending on the
16 nature of the GUI or the downstream OSS. Maine
17 would be the same as Massachusetts because it's the
18 exact same OSS systems. All of New England is the
19 same.

20 Q. Now I'm confused again, and I just need one
21 more clarification. The OSS systems, I believe I
22 heard, or have heard for some time, are the same for
23 New England, New York, Virginia, et cetera.

24 A. [CANNY] The hardware may be located in

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1 outage, a prearranged outage, would be noticed to
2 CLECs saying the GUI will be unavailable for New
3 England?

4 A. [McLEAN] The GUI is an interface method
5 that the CLECs use to access our OSS's. What we do
6 when we publish an unavailability notice is to tell
7 the CLECs what transactions are unavailable. So,
8 for example, if there is a software change going on
9 for the Livewire system, several of the preorder
10 transactions that CLECs would use the GUI to perform
11 would not be available during the Livewire outage.

12 Q. And so that would be the reason that New
13 England might be cited separately or Virginia or New
14 York.

15 A. [McLEAN] Yes.

16 Q. When you construct your metrics regarding
17 the availability of that GUI and there is an outage
18 specifically for New England, is that counted into a
19 special New England interface availability, or is
20 that counted against the GUI availability?

21 A. [CANNY] It would be on the New England
22 report for GUI.

23 Q. So there is a separate New England GUI
24 availability report?

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1 different spots.

2 Q. So that they are the same, but they don't
3 necessarily behave the same. That is what I'm
4 hearing? For instance, you might have to do an
5 update to a process in New England, thereby taking
6 down some systems, but you wouldn't be making that
7 same update someplace else?

8 A. [McLEAN] That's not unusual. It's not
9 unusual, when you have a very large system, to have
10 that system divided into manageable domains. So,
11 for example, the Livewire system is used regionwide,
12 but the data that is stewarded by that application
13 is stored in multiple databases. There may be one
14 for New England and one for New York. So if there
15 is an update being made to the data in New England,
16 New York might still be available.

17 Q. Thank you. One just quick point of
18 clarification, I think to Mr. Barry. In your
19 testimony, or your recent answers to some questions,
20 you talked about same-day due dates for orders that
21 were received before noon in your centers, and I
22 heard Ms. Canny speak about orders that were
23 received before 3:00 o'clock. Which is it?

24 A. [CANNY] It depends on the service. A